

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

-----X
DOUGLAS MILLS,

Plaintiff(s),

-against-

ROMAN CATHOLIC DIOCESE OF ROCKVILLE
CENTRE, ST. AGNES ROMAN CATHOLIC
CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL,

Defendant(s).
-----X

SUMMONS

Plaintiff(s) designate
NASSAU County as the place
of trial.

The basis of the venue is
Situs of the accident

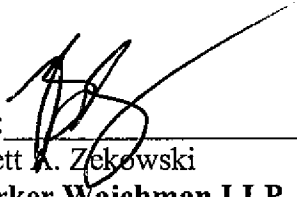
Plaintiff(s) reside at
10 Burston Street
Hempstead, NY 11550

Index No.:
Date Summons &
Complaint Filed:

To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Port Washington, NY
September 16, 2019

By: 
Brett A. Zekowski
Parker Waichman LLP
Office & Post Office Address:
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500
Our File # 9008356

TO:
Roman Catholic Diocese Of Rockville Centre
50 N. Park Avenue
Rockville Center, NY 11571

St. Agnes Roman Catholic Cathedral
29 Quealy Place
Rockville Centre, NY 11570

St. Agnes Cathedral School
70 Clinton Avenue
Rockville Centre, NY 11570

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU-----X
DOUGLAS MILLS,

Plaintiff,

-against-

ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE,
ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST.
AGNES CATHEDRAL SCHOOL,Defendants.
-----X**VERIFIED COMPLAINT**

Index No.:

Jury Trial Demanded

Plaintiff, DOUGLAS MILLS, by his attorneys Parker Waichman LLP, complaining of the defendants, respectfully alleges, on personal knowledge as to himself and on information and belief as to all other matters, as follows:

1. At the time of the commencement of this action plaintiff, DOUGLAS MILLS, was a resident of the County of Nassau, State of New York.
2. At the time of the incident(s) giving rise to this complaint, plaintiff, DOUGLAS MILLS, was a resident of the County of Nassau, State of New York.
3. This action is timely pursuant to CPLR 214-g.
4. At all times herein mentioned, defendant ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, was a religious corporation organized pursuant to the Religious Corporations Law, with its principal office at 50 N. Park Ave, Rockville Centre, County of Nassau, State of New York.
5. At all times herein mentioned, defendant ST. AGNES ROMAN CATHOLIC CATHEDRAL was a religious corporation organized pursuant to the Religious Corporations Law with its principal office 29 Quealy Place, Rockville Centre, County of Nassau, State of New York.

6. At all times herein mentioned, defendant ST. AGNES CATHOLIC SCHOOL was a religious corporation organized pursuant to the Religious Corporations Law with its principal office 70 Clinton Avenue, Rockville Centre, County of Nassau, State of New York.

7. At all times herein mentioned, defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, was a religious order within and under the authority of defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

8. At all times herein mentioned, defendant, ST. AGNES CATHEDRAL SCHOOL, was a religious order within and under the authority of defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

9. At all times herein mentioned, defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, oversaw, managed, controlled, directed and operated, defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

10. At all times herein mentioned, defendant ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, oversaw, managed, controlled, directed and operated, defendant ST. AGNES ROMAN CATHEDRAL SCHOOL.

11. At all times herein mentioned, defendant ST. AGNES ROMAN CATHOLIC CATHEDRAL oversaw, managed, controlled, directed and operated, defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

12. At all times herein mentioned, defendant ST. AGNES ROMAN CATHOLIC SCHOOL, oversaw, managed, controlled, directed and operated, defendant ST. AGNES ROMAN CATHEDRAL SCHOOL.

13. At all times herein mentioned, defendant, DIOCESE OF ROCKVILLE CENTRE, managed, supervised and controlled those who were employed or otherwise worked for defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, including, but not limited to priests, nuns and

other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

14. At all times herein mentioned, defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, managed, supervised and controlled those who were employed or otherwise worked for defendant, ST. AGNES CATHEDRAL SCHOOL, including, but not limited to priests, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE

15. At all times herein mentioned, defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, managed, supervised and controlled those who were employed or otherwise worked for defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, including, but not limited to monsignor, priests, sisters, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

16. At all times herein mentioned, defendant, ST. AGNES CATHEDRAL SCHOOL, managed, supervised and controlled those who were employed or otherwise worked for defendant, ST. AGNES ROMAN CATHEDRAL SCHOOL, including, but not limited to monsignor, priests, sisters, nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

17. At all times herein mentioned, defendant, ST. AGNES CATHEDRAL SCHOOL, managed, supervised and controlled those who were employed or otherwise worked for defendant, ST. AGNES CATHEDRAL SCHOOL, including, but not limited to monsignor, priests, sisters,

nuns and other personnel and volunteers, both while they were on premises and engaged in off-premises activities related to their employment with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

18. From on or about January 1, 1976 through on or about December 31, 1978, plaintiff, DOUGLAS MILLS, was a resident under the care of defendant, ROAMN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

19. From on or about January 1, 1976 through on or about December 31, 1978, plaintiff, DOUGLAS MILLS, an infant, was a resident under the care ST. AGNES ROMAN CATHOLIC CATHEDRAL.

20. From on or about January 1, 1976 through on or about December 31, 1978, plaintiff, DOUGLAS MILLS, was a resident under the care of defendant, ST. AGNES CATHEDRAL SCHOOL.

21. At all times herein mentioned and relevant to the allegations set forth herein Monsignor Patrick Quigley, was a monsignor assigned by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, to defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

22. At all times herein mentioned and relevant to the allegations set forth herein, Monsignor Patrick Quigley, was a monsignor at defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

23. At all times herein mentioned and relevant to the allegations set forth herein Monsignor Patrick Quigley, was a monsignor assigned by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, to defendant, ST. AGNES CATHEDRAL SCHOOL.

24. At all times herein mentioned and relevant to the allegations set forth herein Monsignor Patrick Quigley, was a monsignor assigned by defendant, ST. AGNES ROMAN

CATHOLIC CATHEDRAL, to defendant, ST. AGNES CATHEDRAL SCHOOL.

25. At all times herein mentioned and relevant to the allegations set forth herein, Monsignor Patrick Quigley, was a monsignor at defendant, ST. AGNES CATHEDRAL SCHOOL.

26. At all times herein mentioned, Monsignor Patrick Quigley, was employed by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

27. At all times herein mentioned, Monsignor Patrick Quigley, was employed by the defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

28. At all times herein mentioned, Monsignor Patrick Quigley, was employed by the defendant, ST. AGNES CATHEDRAL SCHOOL.

29. At all times herein mentioned and relevant to the allegations set forth herein Monsignor Edward Melton, was a monsignor assigned by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, to defendant, ST. AGNES CATHEDRAL SCHOOL.

30. At all times herein mentioned and relevant to the allegations set forth herein Monsignor Edward Melton, was a monsignor assigned by defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, to defendant, ST. AGNES CATHEDRAL SCHOOL

31. At all times herein mentioned and relevant to the allegations set forth herein, Monsignor Edward Melton, was a monsignor at defendant, ST. AGNES CATHEDRAL SCHOOL.

32. At all times herein mentioned, Monsignor Edward Melton, was employed by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

33. At all times herein mentioned, Monsignor Edward Melton, was employed by the defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

34. At all times herein mentioned, Monsignor Edward Quigley, was employed by the defendant, ST. AGNES CATHEDRAL SCHOOL

35. At all times herein mentioned and relevant to the allegations set forth herein Sister Theresa "Doe" last name being fictitious and unknown at this time, was a sister assigned by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, to defendant, ST. AGNES CATHEDRAL SCHOOL.

36. At all times herein mentioned and relevant to the allegations set forth herein Sister Theresa "Doe" last name being fictitious and unknown at this time, was a sister assigned by defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, to defendant, ST. AGNES CATHEDRAL SCHOOL.

37. At all times herein mentioned and relevant to the allegations set forth herein, Sister Theresa "Doe" last name being fictitious and unknown at this time, was a sister at defendant, ST. AGNES CATHEDRAL SCHOOL.

38. At all times herein mentioned, Theresa "Doe" last name being fictitious and unknown at this time, was employed by defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

39. At all times herein mentioned, Theresa "Doe" last name being fictitious and unknown at this time, was employed by the defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

40. At all times herein mentioned, Theresa "Doe" last name being fictitious and unknown at this time, was employed by the defendant, ST. AGNES CATHEDRAL SCHOOL.

41. Through his position with defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, Monsignor Patrick Quigley, was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

42. Through his position with defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, Monsignor Patrick Quigley, was put in direct contact with plaintiff, DOUGLAS

MILLS, then an infant.

43. Through his position with defendant, ST. AGNES CATHEDRAL SCHOOL, Monsignor Patrick Quigley, was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

44. Through his position with defendant ROMAN CATHOLIC DIOCESE OF ROCKVILLE, Monsignor Edward Melton was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

45. Through his position with defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL, Monsignor Edward Melton was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

46. Through his position with defendant, ST. AGNES CATHEDRAL SCHOOL, Monsignor Edward Melton was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

47. Through her position with ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, Sister Theresa "Doe" last name being fictitious and unknown at this time was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

48. Through her position with ST. AGNES ROMAN CATHOLIC CATHEDRAL, Sister Theresa "Doe" last name being fictitious and unknown at this time, was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

49. Through her position with ST. AGNES CATHEDRAL SCHOOL, Sister Theresa "Doe" last name being fictitious and unknown at this time, was put in direct contact with plaintiff, DOUGLAS MILLS, then an infant.

50. That on or about January 1, 1976 through December 31, 1978, Monsignor Patrick Quigley, sexually abused the plaintiff, DOUGLAS MILLS.

51. That on or about January 1, 1976 through December 31, 1978, Monsignor Edward Melton, sexually abused the plaintiff, DOUGLAS MILLS.

52. That on or about January 1, 1976 through December 31, 1978, Sister Theresa "Doe" last name being fictitious and unknown at this time, sexually abused the plaintiff, DOUGLAS MILLS.

53. At all times herein mentioned, Monsignor Patrick Quigley, was under the management, supervision, employ, direction and/or control of defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

54. At all times herein mentioned, Monsignor Patrick Quigley, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

55. At all times herein mentioned, Monsignor Patrick Quigley, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES CATHEDRAL SCHOOL.

56. At all times herein mentioned, Monsignor Edward Melton, was under the management, supervision, employ, direction and/or control of defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

57. At all times herein mentioned, Monsignor Edward Melton, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

58. At all times herein mentioned, Monsignor Edward Melton, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES CATHEDRAL SCHOOL.

59. At all times herein mentioned, Sister Theresa "Doe" last name fictitious and

unknown at this time, was under the management, supervision, employ, direction and/or control of defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE.

60. At all times herein mentioned, Sister Theresa "Doe" last name fictitious and unknown at this time, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

61. At all times herein mentioned, Sister Theresa "Doe" last name fictitious and unknown at this time, was under the management, supervision, employ, direction and/or control of defendant, ST. AGNES CATHEDRAL SCHOOL.

62. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew and/or reasonably should have known and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of Monsignor Patrick Quigley, who sexually abused the plaintiff, DOUGLAS MILLS, while plaintiff, DOUGLAS MILLS, was an infant.

63. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew and/or reasonably should have known and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of Monsignor Edward Melton, who sexually abused the plaintiff, DOUGLAS MILLS, while plaintiff, DOUGLAS MILLS, was an infant

64. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew and/or reasonably should have known and/or knowingly condoned and/or covered up, the inappropriate and unlawful sexual activities of Sister Theresa "Doe: last name fictitious and unknown at this time, who sexually abused the plaintiff, DOUGLAS MILLS, while plaintiff, DOUGLAS MILLS, was an infant.

65. Defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, had the responsibility to manage, supervise, control and/or direct monsignors, and sisters assigned to defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL.

66. Defendant, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. had the responsibility to manage, supervise, control and/or direct monsignors, and sisters assigned to defendant, ST. AGNES CATHEDRAL SCHOOL.

67. Defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL had the responsibility to manage, supervise, control and/or direct priests assigned to defendant, ST. AGNES CATHEDRAL SCHOOL.

68. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, had a duty not to aid pedophiles such as Monsignor Patrick Quigley, by assigning, maintaining and/or appointing him to positions in which he would have access to minors.

69. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHEDRAL SCHOOL and ST. AGNES CATHEDRAL SCHOOL had a duty not to aid pedophiles such as Monsignor Edward Melton, by assigning, maintaining and/or appointing him to positions in which he would have access to minors.

70. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL had a duty not to aid pedophiles such as Sister Theresa "Doe" last name fictitious and unknown at this time, by assigning, maintaining and/or appointing her to positions in which she would have access to minors.

71. At all relevant times, Monsignor Patrick Quigley, used his position as a monsignor to entice, take control of plaintiff, DOUGLAS MILLS, and sexually assault, sexually abuse or have sexual contact with plaintiff, DOUGLAS MILLS, while plaintiff was a minor.

72. At all relevant times, Monsignor Edward Melton, used his position as a monsignor to entice, take control of plaintiff, DOUGLAS MILLS, and sexually assault, sexually abuse or have sexual contact with plaintiff, DOUGLAS MILLS, while plaintiff was a minor

73. At all relevant times, Sister Theresa "Doe" last name fictitious and unknown at this time, used her position as a sister to entice, take control of plaintiff, DOUGLAS MILLS, and sexually assault, sexually abuse or have sexual contact with plaintiff, DOUGLAS MILLS, while plaintiff was a minor

74. Defendants, individually, jointly and/or severally, violated various New York statutes, including, but not limited to N.Y. Soc. Serv. Law §§413 and 420, which require school officials and teachers to report suspected cases of child abuse and impose liability for failure to report.

75. Plaintiff suffered physical and psychological injuries and damages as a result of his childhood sexual abuse by Monsignor Patrick Quigley.

76. Plaintiff suffered physical and psychological injuries and damages as a result of his childhood sexual abuse by Monsignor Edward Melton.

77. Plaintiff suffered physical and psychological injuries and damages as a result of his childhood sexual abuse by Sister Theresa "Doe" last name fictitious and unknown at this time.

78. As a direct result of defendants' conduct, plaintiff suffered and will continue to suffer great pain of body and mind, severe and permanent emotional distress and physical manifestations of emotional distress. As a result of his childhood sexual abuse, plaintiff has been prevented from obtaining the full enjoyment of life, has incurred and will continue to incur

expenses for medical and psychological treatment, therapy and counseling and has incurred and will continue to incur loss of income and/or loss of earning capacity.

79. Because of his childhood sexual abuse, plaintiff DOUGLAS MILLS is unable to fully describe all of the details of that abuse and the extent of the harm that he suffered as a result.

**AS AND FOR A FIRST CAUSE OF ACTION
NEGLIGENT HIRING, RETENTION, SUPERVISION AND/OR DIRECTION**

80. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 79 as if fully set forth herein.

81. The sexual abuse of children by adults, including priests and teachers, is foreseeable.

82. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE and ST. AGNES ROMAN CATHOLIC CATHEDRAL, at all relevant times represented and held out to the public, defendant, ST. AGNES CATHEDRAL SCHOOL, to be safe places for learning and participating in youth activities.

83. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were each under an express and/or implied duty to protect and care for plaintiff, DOUGLAS MILLS.

84. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, negligently hired, retained, directed and supervised Monsignor Patrick Quigley, because they knew or should have known that Monsignor Patrick Quigley, posed a threat of sexual abuse of children such as plaintiff.

85. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE, ST. AGNES

ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, negligently hired, retained, directed and supervised Monsignor Edward Melton, because they knew or should have known that Monsignor Edward Melton, posed a threat of sexual abuse of children such as plaintiff

86. Defendants ROMAN CATHOLIC DIOCESE OF ROCKVILLE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, negligently hired, retained, directed and supervised Sister Theresa "Doe" last name fictitious and unknown at this time, because they knew or should have known that Sister Theresa "Doe" last name fictitious and unknown at this time, posed a threat of sexual abuse of children such as plaintiff

87. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or should have known that Monsignor Patrick Quigley, had a propensity to engage in the conduct which caused plaintiff's injuries prior to or about the time of the occurrence of these injuries.

88. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or should have known that Monsignor Edward Melton, had a propensity to engage in the conduct which caused plaintiff's injuries prior to or about the time of the occurrence of these injuries.

89. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or should have known that Sister Theresa "Doe" last name fictitious and unknown at this time, had a propensity to engage in the conduct which caused plaintiff's injuries prior to or about the time of the occurrence of these injuries.

90. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, owed

a duty of care to all minors, including plaintiff, who were likely to come under the influence or supervision of Monsignor Patrick Quigley, in their role as monsignor, sister, priest, counselor, trustee, director, officer, employee, agent, servant and/or volunteer to ensure that Monsignor Patrick Quigley, did not use their assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors.

91. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, owed a duty of care to all minors, including plaintiff, who were likely to come under the influence or supervision of Monsignor Edward Melton, in their role as monsignor, sister, priest, counselor, trustee, director, officer, employee, agent, servant and/or volunteer to ensure that Monsignor Edward Melton, did not use their assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors

92. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, owed a duty of care to all minors, including plaintiff, who were likely to come under the influence or supervision of Sister Theresa "Doe" last name fictitious and unknown at this time, in their role as monsignor, sister, priest, counselor, trustee, director, officer, employee, agent, servant and/or volunteer to ensure that Sister Theresa "Doe" last name fictitious and unknown at this time, did not use their assigned positions to injure minors by sexual assault, sexual abuse or sexual contact with minors

93. Monsignor Patrick Quigley, sexually assaulted, sexually abused and/or had sexual contact with plaintiff, DOUGLAS MILLS, on defendants' premises, including ST. AGNES CATHEDRAL SCHOOL.

94. Monsignor Edward Melton, sexually assaulted, sexually abused and/or had sexual

contact with plaintiff, DOUGLAS MILLS, on defendants' premises, including ST. AGNES CATHEDRAL SCHOOL

95. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were put on notice of Monsignor Patrick Quigley improper and inappropriate actions toward minors.

96. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were put on notice of Monsignor Edward Melton improper and inappropriate actions toward minors.

97. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were put on notice of Sister Theresa "Doe" last name being fictitious and unknown at this time, improper and inappropriate actions toward minors.

98. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly supervise Monsignor Patrick Quigley.

99. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly supervise Monsignor Edward Melton.

100. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly supervise Theresa "Doe" last name being fictitious and unknown at this time.

101. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were

negligent in failing to properly manage Monsignor Patrick Quigley.

102. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly manage Monsignor Edward Melton.

103. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly manage Sister Theresa "Doe" last name being fictitious and unknown at this time.

104. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly control Monsignor Patrick Quigley.

105. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly control Monsignor Edward Melton.

106. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were negligent in failing to properly control Sister Theresa "Doe" last name being fictitious and unknown at this time.

107. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were willful, wanton, malicious, reckless and/or outrageous in their disregard for the rights and safety of plaintiff.

108. As a direct and proximate result of defendants' above described omissions, plaintiff has suffered and will continue to suffer the injuries described herein.

109. By reason of the foregoing, the defendants are liable to plaintiff jointly, severally and/or in the alternative, for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**AS AND FOR A SECOND CAUSE OF ACTION
NEGLIGENCE/GROSS NEGLIGENCE**

110. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 109 as if fully set forth herein.

111. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or negligently failed to know that Monsignor Patrick Quigley, posed a threat of sexual abuse to children.

112. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or negligently failed to know that Monsignor Edward Melton, posed a threat of sexual abuse to children.

113. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, knew or negligently failed to know that Sister Theresa "Doe" last name being fictitious and unknown at this time, posed a threat of sexual abuse to children.

114. The acts of Monsignor Patrick Quigley, as described above, were undertaken, enabled by, and/or during the course of their respective employment, assignment, appointment and/or agency with defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

115. The acts of Monsignor Edward Melton, as described above, were undertaken, enabled by, and/or during the course of their respective employment, assignment, appointment and/or agency with defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL

116. The acts of Sister Theresa "Doe" last name being fictitious and unknown at this time, as described above, were undertaken, enabled by, and/or during the course of their respective employment, assignment, appointment and/or agency with defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

117. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL:

- a. gave improper or ambiguous orders or failed to make proper regulations, and/or employed improper persons in work involving risk of harm to others;
- b. failed to adequately supervise the activities of Monsignor Patrick Quigley, Monsignor Edward Melton and Sister Theresa "Doe" last name being fictitious and unknown at this time;
- c. failed to adequately supervise and safeguard minors attending defendants, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL;
- d. permitted and/or intentionally failed and/or neglected to prevent negligent or tortious conduct by persons, whether or not their servants, agents or employees, upon premises under their control; and
- e. allowed the acts of omission and/or commission of any or all of the allegations set forth in this Complaint to occur.

118. At all relevant times, Monsignor Patrick Quigley was under the supervision, employ, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

119. At all relevant times, Monsignor Edward Melton was under the supervision, employ, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

120. At all relevant times, Sister Theresa "Doe" last name being fictitious and unknown at this time, was under the supervision, employ, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

121. At all relevant times, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were wanton, willful, malicious, reckless and outrageous in their disregard for the rights and safety of plaintiff, which conduct was equivalent to criminal conduct.

122. As a direct and/or indirect result of said conduct, plaintiff has suffered injuries and damages as described herein.

123. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**THIRD CAUSE OF ACTION
BREACH OF FIDUCIARY DUTY**

124. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 123 as if fully set forth herein.

125. At all relevant times, there existed a fiduciary relationship of trust, confidence, and reliance between plaintiff, on the one hand, and defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, on the other, based upon the entrustment of plaintiff, while he was a minor child, to the care and supervision of the defendants and each of them, as a parishioner, worshiper, invitee, attendee or guest at defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and as a student, invitee, attendee or guest at defendant, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL. The entrustment of the plaintiff to the care and supervision of the defendants and each of them, while plaintiff was a minor child, required the defendants to assume a fiduciary role and to act in the best interests of the plaintiff and to protect him while he was a minor and vulnerable child.

126. Pursuant to their fiduciary relationship with plaintiff, defendants were entrusted with the well-being, care and safety of plaintiff.

127. Pursuant to their fiduciary relationship with plaintiff, defendants assumed a duty to act in the best interests of plaintiff, Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, breached their fiduciary duties to plaintiff.

128. At all relevant times, the actions and/or inactions of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC

CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were willful, malicious, wanton, reckless and outrageous in their disregard for the rights and safety of plaintiff.

129. As a direct result of defendants' conduct, plaintiff has suffered injuries and damages described herein.

130. By reason of the foregoing, defendants, jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FOURTH CAUSE OF ACTION
BREACH OF NON-DELEGABLE DUTY**

131. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 130 as of fully set forth herein.

132. When he was a minor, plaintiff, DOUGLAS MILLS, was placed in the care of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL,, for the purposes of providing plaintiff with a safe environment in which to participate in youth activities and receive an education. There was thus created a non-delegable duty of trust between plaintiff and defendants.

133. Plaintiff, DOUGLAS MILLS, was a vulnerable child when placed in the care of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

134. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and each of them, were in the best position to prevent plaintiff from being abused and/or to have learned

of the repeated abuse by Monsignor Patrick Quigley, and to have stopped it.

135. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL and each of them, were in the best position to prevent plaintiff from being abused and/or to have learned of the repeated abuse by Monsignor Edward Melton, and to have stopped it

136. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and each of them, were in the best position to prevent plaintiff from being abused and/or to have learned of the repeated abuse by Sister Theresa "Doe" last name being fictitious and unknown at this time, and to have stopped it

137. As evidenced by the fact that plaintiff, DOUGLAS MILLS, was sexually abused as a minor child entrusted to the care of the defendants, these defendants breached their non-delegable duty to plaintiff.

138. At all relevant times, Monsignor Patrick Quigley, was under the supervision, employment, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL.

139. At all relevant times, Monsignor Edward Melton, was under the supervision, employment, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL

140. At all relevant times, Sister Theresa "Doe" last name being fictitious and unknown at this time, was under the supervision, employment, direction and/or control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN

CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL

141. As a result of the sexually abusive conduct of Monsignor Patrick Quigley, plaintiff, DOUGLAS MILLS, suffered the injuries and damages described herein, the full extent of which is unknown at present.

142. As a result of the sexually abusive conduct of Monsignor Patrick Quigley, plaintiff, DOUGLAS MILLS, suffered the injuries and damages described herein, the full extent of which is unknown at present.

143. As a result of the sexually abusive conduct of Sister Theresa "Doe" last name being fictitious and unknown at this time, plaintiff, DOUGLAS MILLS, suffered the injuries and damages described herein, the full extent of which is unknown at present.

144. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**FIFTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

145. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 144 above as if set forth at length herein.

146. As described above, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and Monsignor Patrick Quigley, acted in a negligent and/or grossly negligent manner.

147. As described above, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES

CATHEDRAL SCHOOL, and Monsignor Edward Melton, acted in a negligent and/or grossly negligent manner.

148. As described above, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and Sister Theresa "Doe" last name being fictitious and unknown at this time, acted in a negligent and/or grossly negligent manner.

149. The actions of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and Monsignor Patrick Quigley, endangered plaintiff's safety and caused him to fear for his own safety.

150. The actions of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and Monsignor Edward Melton, endangered plaintiff's safety and caused him to fear for his own safety

151. The actions of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, and Sister Theresa "Doe" last name being fictitious and unknown at this time, endangered plaintiff's safety and caused him to fear for his own safety

152. As a direct and proximate result of the actions of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, which included, but were not limited to, negligent and/or grossly negligent conduct, plaintiff suffered severe injuries and damages as described herein, including, but not limited to, mental and emotional distress.

153. By reason of the foregoing, defendants, jointly, severally and/or in the alternative

are liable to plaintiff for compensatory damages and for punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SIXTH CAUSE OF ACTION
BREACH OF DUTY *IN LOCO PARENTIS***

154. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 153 as if set forth at length herein.

155. While he was a minor, plaintiff was entrusted by his parents to the control of the defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, for the purposes of providing plaintiff with an education and allowing him to participate in youth activities sponsored by defendants. During the times that plaintiff was at school and during the times that he participated in youth activities, he was under the supervision and control of defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL. These defendants, and each of them, at all relevant times and now, owed and owe a duty to children entrusted their care to act *in loco parentis* and to prevent foreseeable injuries.

156. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, breached their duty to act *in loco parentis*.

157. At all relevant times the actions of defendants ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, were willful, malicious, wanton, reckless, negligent, grossly negligent and/or outrageous in their disregard for the rights and safety of plaintiff.

158. As a direct result of defendants' conduct, plaintiff, DOUGLAS MILLS, has suffered the injuries and damages described herein.

159. By reason of the foregoing, defendants jointly, severally and/or in the alternative, are liable to plaintiff for compensatory damages, and for punitive damages, together with interest and costs in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**SEVENTH CAUSE OF ACTION
BREACH OF STATUTORY DUTY PURSUANT TO NEW YORK
SOCIAL SERVICES LAW §§ 413, 420 TO REPORT ABUSE**

160. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 159 as if fully set forth herein.

161. Pursuant to N.Y. Social Services Law §§413, 420, defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, had a statutory duty to report the reasonable suspicion of abuse of children in their care.

162. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by Monsignor Patrick Quigley, of children in their care.

163. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL, breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by Monsignor Edward Melton, of children in their care

164. Defendants, ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES ROMAN CATHOLIC CATHEDRAL and ST. AGNES CATHEDRAL SCHOOL,

breached that duty by knowingly and willfully failing to report reasonable suspicion of abuse by Sister Theresa "Doe" true last name fictitious and unknown at this time, of children in their care

165. As a direct and/or indirect result of said conduct, plaintiff has suffered injuries and damages as described above.

166. By reason of the foregoing, defendants jointly, severally and/or in the alternative are liable to plaintiff for compensatory damages and punitive damages, together with costs and interest in excess of the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against defendants on each cause of action as follows:

- A. Awarding compensatory damages in an amount to be proven at trial, but in any event in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction;
- B. Awarding punitive damages to the extent permitted by law;
- C. Awarding prejudgment interest to the extent permitted by law;
- D. Awarding costs and fees of this action, including attorneys' fees, to the extent permitted by law;
- E. Awarding such other and further relief as to this Court may seem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: Port Washington, New York
September 16, 2019

Yours, etc.



Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
Office & Post Office Address
6 Harbor Park Drive
Port Washington, NY 11050
516-466-6500
Our File # 9008356

ATTORNEY'S VERIFICATION

STATE OF NEW YORK)
 : ss :
COUNTY OF NASSAU)

Brett A. Zekowski, an attorney and counselor at law, duly admitted to practice in the Courts of the State of New York, affirms the following to be true under penalties of perjury:

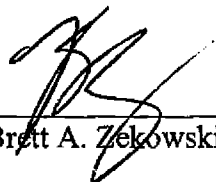
I am an associate of the firm **Parker Waichman LLP** attorneys for the plaintiff(s) herein.

I have read the foregoing SUMMONS AND COMPLAINT and know the contents thereof. Upon information and belief, I believe the matters alleged therein to be true.

The source of your deponent's information and the grounds of my belief are communications, papers, reports and investigations contained in my file.

The reason this verification is made by deponent and not by plaintiff(s) is that plaintiff(s) reside in a county other than the one in which your deponent's office is maintained.

Dated: Port Washington, NY
September 16, 2019



Brett A. Zekowski

Parker Waichman LLP

Index No.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NASSAU

DOUGLAS MILLS,

Plaintiff(s),

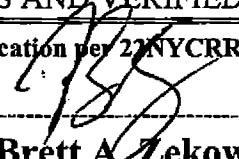
-against-

ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE, ST. AGNES
ROMAN CATHOLIC CATHEDRAL and ST. AGNES
CATHEDRAL SCHOOL,

Defendant(s).

SUMMONS AND VERIFIED COMPLAINT

Certification per 22 NYCRR §130-1.1a


Brett A. Zekowski
Parker Waichman LLP
Attorneys for Plaintiff(s)
6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500To:
Attorney(s) for

Service of a copy of the within is hereby admitted.

Dated:
Attorney(s) for**PLEASE TAKE NOTICE****NOTICE OF****ENTRY** that the within is a (certified) true copy of a entered in the office of the Clerk of the within named
Court on 2019 .**NOTICE** that an Order of which the within is a true copy will be presented to the Hon. , one of the
OF**SETTLEMENT** judges of the within named Court, at ,
, on
2019, at M.Dated: Port Washington, New York
September 16, 2019Parker Waichman LLP
Attorneys for Plaintiff(s)